



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

Reply to
Attn Of: OWW-135

DRAFT – MLS - January 31, 2007

Karen L. Durham-Aguilera, P.E.
Director, Programs
Department Of The Army
Corps Of Engineers, Northwestern Division
Po Box 2870
Portland Or 97208-2870

Dear Ms. Durham-Aguilera:

This letter is in response to a request by the U.S. Army Corps of Engineers (Corps) to the U.S. Environmental Protection Agency (EPA) to review the Water Quality Plan for Total Dissolved Gas and Water Temperature in the Mainstem Columbia and Snake Rivers, *Interim Update of the 2004 Plan*, (Water Quality Plan) dated November 30, 2006. EPA has had a long and productive work relationship with the Corps on the development and prior drafts of this Columbia River Water Quality Plan. We appreciate the opportunity to comment on this important work effort and we believe our comments are timely in light of our recent commitments to work together on federal dam water quality and endangered species Portland, OR, workshop, in November 2006.

EPA understands that this Water Quality Plan is currently under discussion and will be incorporated to some extent in the remanded Federal Columbia River Power System Biological Opinion, expected to final in July 2007. We understand that the Corps has received comments from Oregon Department of Environmental Quality and Washington Ecology on total dissolved gas. EPA's comments are focused on water temperature improvements in the Columbia and Snake River Mainstem. EPA has long asserted the importance of water temperature improvements in Columbia and Snake River system as critical for salmon restoration efforts. EPA has demonstrated a commitment through a number of important work efforts, working with our federal, state, tribal and other partners, to improve water temperature in the both the tributaries and Mainstem.

Our comments on the Water Quality Plan are focused on two categories of water temperature actions. The first category is water temperature actions that are ongoing which we would like to see a continued or enhanced commitment to these work efforts. The second category is a short list of potential actions, identified in the Water Quality Plan, which are not underway at this time, however, EPA believes these potential actions are worthy of further scoping, feasibility analysis and/or investigation.

- EPA appreciates the commitment of the Corps to operational decisions for Dworkshak reservoir to improve water temperatures in the Lower Snake

River. EPA has been providing real time technical and modeling analysis to assist in those cold water release decisions to aid in juvenile salmon migration and reduce Snake River Mainstem water temperatures. We would like to ensure a continued commitment to this important water temperature measure.

- EPA also appreciates the commitment of the Corps to water temperature monitoring. We would like to encourage the Corps and other agencies to continue to improve and enhance temperature monitoring to ensure an adequate understanding of Columbia River temperatures.
- EPA recommends that collaborative discussions are undertaken to investigate operational changes and/or penstock selective withdrawal at the Grand Coulee Powerhouse for water temperature improvements. The Bureau of Reclamation developed a report in June 2003, *Grand Coulee Dam-Lake Roosevelt, Initial Review of Three Strategies to Manage Water Temperature at Grand Coulee Dam* which discussed three potential temperature reduction actions at Grand Coulee Dam. EPA would like to see further work efforts and analysis to explore the feasibility of these three water temperature reduction options .
- EPA recommends that collaborative discussions are undertaken to investigate cool water releases from the Hells Canyon hydro projects. EPA has conducted technical analyses that have explored the potential impact of cool water releases from Hells Canyon and we are very interested in collaborative conversations and work efforts with the Corps, the Bureau of Reclamation, Idaho Power, the Nez Perce Tribe and other entities to explore potential water temperature reduction actions.
- EPA would like to see a continued commitment to explore options in the McNary Dam forebay to determine if there are options to reduce water temperatures in the juvenile bypass systems

Please feel free to contact my office at (206)553-7151, or call John Palmer of my staff at (206) 553- 6521 of my staff if you have any question on this letter. Thank you again for your participation and commitment to work through these very challenging water quality issues.

Sincerely,

Michael F. Gearheard
Director
Office of Water & Watersheds

cc: Lauri Aunan, ODEQ

Melissa Gildersleeve, Washington Ecology

Barry Burnell, IDEQ

Tom Karier, Chair, Northwest Power and Conservation Council

bcc: John Palmer, Jannine Jennings, Mary Lou Soscia, Ben Cope, Richard Parkin
Jim Ruff and Tony Grover, NWPCC, Denise Keehner and Amy Newman, EPA
Office of Science and Technology, Office of Water
Rudd Turner and Dave Ponganis, Corps of Engineers
Others?